Washington State Citizens Committee on Pipeline Safety

June 30, 2004

Stacey Gerard
Associate Administrator
Office of Pipeline Safety
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, Southwest, Room. 2103
Washington D.C. 20590-0001

Dear Ms. Gerard:

Subject: Pilot Program for SCADA Controller Certification ("CCert") Project

At our June 15, 2004 Citizens Committee on Pipeline Safety meeting, Mr. Richard Kuprewicz, a member of OPS's recently formed CCert Focus Group, presented his personal observations regarding recent Focus Group discussions. The Focus Group's purpose is to assist OPS efforts required by the Pipeline Safety Improvement Act of 2002 concerning certification of individuals utilizing SCADA systems to control the operation of pipelines. After serious discussion and thought, our Committee makes the following recommendations to OPS regarding the pilot program study:

1) Efforts should concentrate on evaluating control room operator training requirements as they pertain to the specific operation of oil and gas transmission pipelines. There are many companies whose operating control room center SCADA systems incorporate multiple types of pipelines, such as gathering, distribution, and transmission. If a system with such multiple operations is chosen (i.e., an LDC operating both distribution and transmission pipelines) as part of the three facilities studied under the pilot program, efforts should remain focused on the transmission pipelines. Our Committee understands that the knowledge, skills, and abilities required for transmission pipeline SCADA systems are substantially different and unique, and need to be captured in this important task.

2) For many reasons, we advise that the pilot program efforts required by the Pipeline Safety Improvement Act of 2002 not get lost in the details, but address the higher level qualification concepts or unique attributes so important to effective SCADA operation on

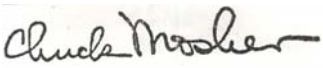
transmission pipelines. Quite simply, focus on training issues answering the very simple question: What makes transmission pipeline control center operator training different or unique?

While vital, we need to also stress that training plays just one important role in the SCADA issues facing pipeline operation. We also strongly support any additional OPS efforts that will advance SCADA design, operating, and maintenance practices, either via improved industry standards, guidelines, or regulation. Each pipeline system can be unique and many companies are moving operation of their various pipelines into centralized SCADA facilities. Centralization can increase the potential for poor SCADA practices to be carried over onto many pipelines, neutralize the ability of the control room operator to distinguish unique factors critical to a specific pipeline operation, place additional burdens and demands on these operators, and jeopardize safety. It is thus important to address all proper aspects of an effective SCADA system on transmission pipelines, as centralization will remain a continuing trend for many reasons.

We applaud and support OPS's efforts to quickly bring together a broad cross section of industry, regulators, research, and the public to constructively work together and develop an effective and efficient program. The smaller Focus Group approach appears to be one method to successfully insure proper dialogue among all parties.

Please feel free to call on our Committee if we can be of further assistance in this very important matter. Thank you.

Sincerely,



Chuck Mosher
Chair, Washington State Citizens Committee on Pipeline Safety

cc. Karen Butler, OPS Central Region